

# WASTEWATER DISCHARGE PERMIT: DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: CITY OF STAMFORD

## PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0030279

APPLICATION #: 20161056

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## PERMIT INFORMATION

**DURATION** 5 YEAR X 10 YEAR     30 YEAR    

**TYPE** New     Reissuance     Modification X

**CATEGORIZATION** POINT (X) NON-POINT ( ) GIS #

NPDES (X ) PRETREAT ( ) GROUND WATER(UIC) ( ) GROUND WATER (OTHER) ( )

NPDES MAJOR(MA)    

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI)    

NPDES or PRETREATMENT MINOR (MI) X

PRETREAT SIGNIFICANT INDUS USER(SIU)    

PRETREAT CATEGORICAL (CIU)    

**Note: If it=s a CIU then check off SIU**

POLLUTION PREVENTION MANDATE    

ENVIRONMENTAL EQUITY ISSUE

SIC CODE: n/a

**COMPLIANCE SCHEDULE** YES X NO    

POLLUTION PREVENTION     TREATMENT REQUIREMENT     WATER CONSERVATION    

WATER QUALITY REQUIREMENT     REMEDIATION     OTHER X (**Implementation of elements of the Stormwater Management Plan**)

**RECENT ENFORCEMENT HISTORY**

Is the Permittee subject to a pending enforcement action? Yes X No    

The City is currently complying with an EPA (not DEEP) Administrative Order.

**OWNERSHIP CODE**

Private     Federal     State     Municipal (town only) X Other public    

**DEEP STAFF ENGINEER** Christopher Stone

**PERMIT FEES**

Discharge Code	DSN Number	Annual Fee
1080000	various	1456.25

**FOR NPDES DISCHARGES**

Drainage basin Code: 7000, 7403, 7404, 7405, 7406, 7407

Water Quality Standard: A, AA, B, SA, SB

**NATURE OF BUSINESS GENERATING DISCHARGE**

With a population of between 100,000 and 250,000 discharging to its storm sewer system, the City of Stamford qualifies as a Medium Municipal Separate Storm Sewer System (Medium MS4) under Phase 1 of EPA's stormwater regulations. This permit covers the entire storm sewer system for the City and includes all drainage areas that contribute to the storm sewer system. It also requires the implementation of measures by permittee for certain private activities that may have an impact on the quality of stormwater conveyed through the City's drainage system.

**PROCESS AND TREATMENT DESCRIPTION (by DSN)**

The treatment of stormwater discharges from the City's system will vary among the several hundred discharges. The treatment may range from simple catch basin sumps to advanced sediment removal structures to multi-stage sediment, nutrient and bacteria treatment systems. The Stormwater Management Plan for the City will specify which discharges will have treatment and of what kind.

**RESOURCES USED TO DRAFT PERMIT**

- ☐ Federal Effluent Limitation Guideline \_\_\_\_\_  
name of category
- ☐ Performance Standards
- ☒ Federal Development Document EPA's MS4 Permit Improvement Guide  
name of category
- ☐ Treatability Manual
- ☒ Department File Information
- ☒ Connecticut Water Quality Standards
- ☒ Anti-degradation Policy
- ☐ Coastal Management Consistency Review Form
- ☒ Other - Explain  
Recently reissued DEEP Small MS4 general permit

#### **BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS**

- ☐ Best Practicable Technology (BPT)
- ☒ Best Professional Judgement (See Other Comments)
- ☒ Case by Case Determination (See Other Comments)
- ☒ In order to meet in-stream water quality (See General Comments)
- ☒ Anti-degradation policy

#### **GENERAL COMMENTS**

Consistent with EPA's requirements for the MS4 permitting program, this permit does not include numeric effluent limits but rather requires non-numeric effluent limits instituted in the form of control measures implemented to the Maximum Extent Practicable. Pursuant to EPA permitting criteria, these measures are developed using Best Professional Judgment. There are also measures in the permit that address discharges to High Quality Waters and Impaired Waters to meet the requirements of the Anti-degradation Implementation Policy in the CT Water Quality Standards and the TMDL programs, respectively. There is extensive monitoring included in the permit that may be used to evaluate water quality, measure control measure effectiveness, and address potential impacts to water bodies in the City as the program progresses.

#### **EXISTING PERMIT**

Stamford's MS4 permit requires the City to develop a Stormwater Management Plan (Plan). The Plan includes requirements regarding how the City operates and maintains its stormwater infrastructure. A particular focus is

addressing discharges to waters listed by DEEP as impaired, waters for which Total Maximum Daily Load (TMDL) analyses have been developed, and those waters designated by DEEP as high quality waters. The Plan also requires the City to demonstrate legal authority to implement certain elements of the permit. The Plan addresses these issues through the use of “control measures” within one of five categories. These categories include: public education and involvement, which includes measures for public involvement and outreach; pollution prevention, including spill prevention, pesticide/herbicide/fertilizer (PHF) practices, salt storage practices and evaluating discharges to the MS4; land disturbance and development, including E&S control guidance and references to the DEEP Stormwater Quality Manual and E&S Guidelines as well as measures addressing impervious cover and encouraging Low Impact Development (LID); illicit discharge detection and elimination (IDDE), including a specific protocol for conducting these activities; and infrastructure operations and maintenance, including detailed requirements for scheduling, tracking and inspections for these measures.

The current permit includes a monitoring program requiring the sampling of 10 stream locations four times per year. Sampling also includes in-stream dry- and wet-weather sampling as well as wet weather sampling of all City-owned outfalls twice during the permit term. The purpose of the monitoring program is to determine where and when additional control measures may be required to address impacts to water quality with particular priority to impaired or high quality waters.

Additionally, the City is required to submit an annual report summarizing their progress with the various requirements of the permit from year to year. A detailed list of requirements for these reports is included in the permit.

### **PROPOSED MODIFICATION**

The modifications proposed by the City include: changes to the timelines for implementing certain elements of the permit; the addition of “flows from firefighting activities” as authorized non-stormwater discharges; modification of the schedule and protocol for the City’s street sweeping program; a stormwater infrastructure retrofit program; and elimination of in-stream monitoring in favor of outfall monitoring that focuses on impaired waters and identifying outfalls that may be contributing to those impairments. The complete text of these modifications is included in the proposed permit modification available at [www.ct.gov/deep/stormwater](http://www.ct.gov/deep/stormwater).

These modifications are being requested by the City to provide a closer parity with the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (Small MS4 permit) that covers 121 towns in the state, including the cities of Hartford, New Haven and Bridgeport. The modifications for the timelines, authorized non-stormwater discharges, street sweeping and monitoring are alterations of existing requirements in Stamford’s MS4 permit. The Commissioner agrees that it is appropriate to change these to be more consistent with the Small MS4 permit and the requirements for cities with stormwater infrastructure of similar size and scope to Stamford. The retrofit program is a new addition to Stamford’s MS4 permit that is also included in the Small MS4 permit. The Commissioner believes that this program is vital to Department’s efforts to reduce impervious cover throughout the state and helps address the reduction of pollutants contributing to impaired waters in the state. While Stamford is a Phase 1 Medium MS4 rather than a Phase 2 Small MS4, the permit modifications still meet, and actually exceed, the requirements of the EPA Phase 1 Rule while providing parity with the MS4 programs of Small MS4s in the state.